

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF OHIO**

IN RE:)	CHAPTER 13 PROCEEDING
)	
Carol Manuel)	CASE NO.: 17-52365
)	
)	JUDGE ALAN M. KOSCHIK
)	
DEBTOR(S))	OBJECTION TO TRUSTEE'S
)	MOTION TO DISMISS
)	

Now comes Debtor Carol Manuel, by and through undersigned counsel, to hereby OBJECT to the Trustee's Motion to Dismiss. The Trustee states as his grounds for dismissal that Debtor must file a new plan that addresses feasibility and vehicle treatment.

Debtor's counsel is preparing a plan to address these issues. Debtor has been working to file both federal and state tax returns. The State of Ohio recently amended a proof of claim accordingly. Debtor may also amend some returns that were previously filed. Debtor's overall tax liability is causing some of the feasibility issues in Debtor's case.

WHEREFORE, Debtor prays that the Trustee's Motion to Dismiss be denied.

Respectfully submitted,

/s/ James R. Galehouse
James R. Galehouse (0084867)
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CERTIFICATE OF SERVICE

I hereby certify that the foregoing Objection to Trustee's Motion to Dismiss Case was electronically transmitted on or about April 19, 2018, via the Court's CM/ECF system to the following who are listed on the Court's Electronic Mail Notice list:

- James R. Galehouse jgalehouse@ohiolegalclinic.com, jamesgalehouse@yahoo.com;nkrenisky@ohiolegalclinic.com;rausermail@ohiolegalclinic.com;jrauser@ohiolegalclinic.com;rauserlaw@gmail.com;rauser@bestclientinc.com;rauserandassociates@gmail.com
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- Richard P. Schroeter rschroeter@amer-collect.com, sallman@amer-collect.com;HouliECF@aol.com;jvaughan@amer-collect.com
- United States Trustee (Registered address)@usdoj.gov
- Keith D. Weiner bankruptcy@weinerlaw.com

I further certify that the following received notice by regular U.S. Mail at the specified address on the date first set forth above:

Carol Manuel
1885 Ridge Meadow Ct
Twinsburg, OH 44087

/s/ James R. Galehouse
James R. Galehouse (0084867)